



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

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Ref: 8HWM-FF

Mr. Richard Schassburger
Department of Energy
Rocky Flats Office
P.O. Box 928
Golden, CO 80402-0928

re: OU 8 Final Workplan

Dear Mr. Schassburger:

EPA and CDH have reviewed your December 1, 1992, Final Workplan submittal. With some exceptions, we find that the specific technical comments contained in our reviews of the draft document have been adequately addressed. However, little if any progress has been made in resolving how this workplan will be integrated with the Industrial Area IM/IRA which has been proposed, or into DOE's overall approach to the Transition, D&D, and Environmental Restoration of Rocky Flats. Despite this problem, we see some benefit in proceeding with completion and implementation of it, as the early stages of the investigation will produce information which will be useful in evaluating these IHSSs regardless of the administrative path utilized.

The principal deficiency in the Final Workplan is the apparent lack of a DOE commitment to implementation. Recent statements indicating DOE feels the IM/IRA will control the progress of Remedial Investigation work within the Industrial Area raise doubts whether DOE has any intention of proceeding with the OU 8 fieldwork as described in this plan.

EPA and CDH want to see the OU 8 Remedial Investigation proceed. Our remaining concerns, as described in the attached comments, need to be resolved expeditiously to allow this to happen. Consequently, DOE must submit updated texts and figures for the Workplan as necessary to address these concerns no later than February 26, 1993. We will work with DOE as required in preparing these materials and in providing prompt reviews. This should allow for approval to be granted in time for field work to begin as scheduled.

Concurrently, all efforts should be made to work out an acceptable scope and schedule for the IM/IRA so this plan can be

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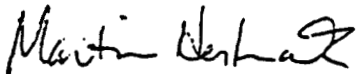
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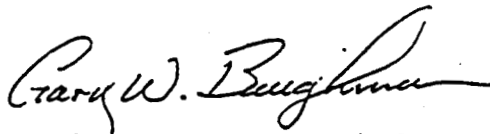
revised as necessary to reflect the implications of that action on the scope and schedule of the field investigations.

If you have questions or would like to discuss the progress of this effort, please contact Bill Fraser (EPA) at 294-1081, or Harlen Ainscough (CDH) at 692-3337.

Sincerely,



Martin Hestmark, EPA
Manager
Rocky Flats Project



Gary Baughman, Chief
Facilities Section
Hazardous Waste Control Program
Colorado Department of Health

cc: Harlen Ainscough, CDH
Bruce Thatcher, DOE
Jackie Barardini, CDH-OE
Dan Miller CO-AGO